



July 27, 2010

The Honorable Spencer Black  
Chair, Special Committee on Single-Use Plastics  
Wisconsin State Assembly  
P.O. Box 8952  
Madison, WI 53708-8952

**Re: Comments on Single Use Plastic Packaging and Recycling Issues**

Dear Chairperson Black:

The American Chemistry Council (ACC) appreciates the opportunity to comment on Wisconsin's study on single use plastic packaging and recycling issues. ACC members include the country's leading plastic resin manufacturers – companies that have been at the forefront of developing and deploying technologies, policies and programs to promote recycling. For ACC, rigid container<sup>1</sup> recycling and recycling of bags and film are high priorities, and we would welcome the opportunity to discuss these opportunities and others with the committee.

We believe good data leads to good policy, and so we would urge the Wisconsin Legislature and Committee to consider the results of a number of recent recycling and life cycle studies conducted in these areas. In particular, we point to ACC's 2008 National Post-Consumer Recycled Plastic Bags and Film Report and 2008 National Post-Consumer Report on Non-Bottle Rigid Plastic Recycling, both released in early 2010, which highlight a growing national trend to expand curbside plastic recycling beyond bottles to non-bottle rigid containers and bags and film. For more on either study, visit: [www.americanchemistry.com/plastics](http://www.americanchemistry.com/plastics). In addition to local efforts like Racine and Kenosha's collection of all bottles and household containers, more than sixty-two percent of Californians now have curbside recycling for all plastic containers.<sup>2</sup> In Connecticut, recyclers just announced that over sixty communities plan to begin collecting rigid containers.<sup>3</sup> And New York City has proposed legislation -- which ACC supports -- to expand its recycling infrastructure to include non-bottle rigid plastics.<sup>4</sup>

We recommend the Committee consider opportunities to expand recycling in Wisconsin to include non-bottle rigid plastic recycling, and consider opportunities to expand awareness of bag and film recycling at local grocery and retail stores.

<sup>1</sup> In June 2009 the Association of Post Consumer Plastic Recyclers defined a "rigid plastic" as a rigid plastic material that is a) not a #1 or #2 bottle, b) a non-bottle and c) between six ounces to six gallons, [www.plasticsrecycling.org](http://www.plasticsrecycling.org)

<sup>2</sup> ACC 2008 United States National Post Consumer Report on Non-Bottle Rigid Plastics Recycling, published 2010

<sup>3</sup> [http://www.crra.org/pages/Press%20releases/2010/CRRA\\_to\\_expand\\_Mid-Connecticut\\_Project\\_plastics\\_recycling.htm](http://www.crra.org/pages/Press%20releases/2010/CRRA_to_expand_Mid-Connecticut_Project_plastics_recycling.htm)

<sup>4</sup> NYC wants more plastics recycling, "Plastics News, Don Loepp, April 19, 2010

ACC welcomes future discussions with the Committee on any of the studies and research highlighted below and looks forward to collaborative efforts to increase plastics recovery.

### **Life Cycle Resources on Plastics and Packaging**

We also suggest that the Committee consider approaching these issues from a “whole life” or “life cycle” perspective as a means to gain a more complete understanding of the pros, cons, benefits and disadvantages of different materials. ACC is proud to have been the first trade association within the packaging value chain to provide life cycle inventory data for virgin resins to the U.S. EPA and the U.S. Life Cycle Inventory Database. This data was introduced in 2007.<sup>5</sup> In 2010, ACC updated the virgin resin data and expanded its data set to include an LCI on PET and HDPE recycled resins.<sup>6</sup> ACC’s resin life cycle inventory data have subsequently been peer reviewed and embraced by U.S. EPA and many organizations have adopted this data for use in their sustainability tools including Wal-Mart packaging scorecard.

Life cycle data can be used to identify the environmental impacts of packaging choices and alternatives. These studies often show that plastics offer environmental benefits compared to alternatives. For example, “The Contribution of Plastic Products to Resource Efficiency,” found plastics reduce energy use by 26% and greenhouse gas emissions by 56% across variety of applications compared to alternatives.<sup>7</sup>

In addition, Life Cycle Inventory (LCI) studies on plastic compared to other packaging materials indicate that significant reductions in energy consumption, solid waste generation, and greenhouse gas emissions can be achieved by moving to lighter weight packaging, and that the benefits are particularly pronounced for flexible, as opposed to rigid, containers. ACC supported research to examine the environmental impacts of tuna, coffee and milk containers.<sup>8</sup> The studies were performed by Franklin Associates, a respected life cycle assessment firm, and peer reviewed by an independent board of experts. The studies took a cradle-to-grave approach, scrutinizing the steps from raw material extraction through disposal and/or recycling. ACC’s LCI data and studies are available online at: [www.americanchemistry.com/plastics](http://www.americanchemistry.com/plastics).

### **Plastic Bag and Film Reports and Studies**

Questions of paper vs. plastic and the use of reusable bags are not new for Wisconsinites. In December 2009, a Madison mandate required city residents to take their recyclable plastic bags to any of 10 city drop-off sites or private plastic bag recycling locations around the city. The mandate successfully increased the amount of plastic bag and film recycled. This

<sup>5</sup> Cradle-to-Gate Life Cycle Inventory of Nine Plastics Resins and Two Polyurethane Precursors (Franklin Associates 2007)

<sup>6</sup> Life Cycle Inventory of 100% Postconsumer HDPE and PET Recycled Resin from Postconsumer Containers and Packaging (Franklin Associates 2010)

<sup>7</sup> GUA - Gesellschaft für umfassende Analysen, “The Contribution of Plastic Products to Resource Efficiency,” Vienna, 2005

<sup>8</sup> Plastic Packaging Life Cycle Inventory (LCI) Studies for Coffee, Tuna and Milk Containers (Franklin Associates 2008) for summaries see <http://www.use-less-stuff.com/2009-research/Coffee-LCI-Study-Summary.pdf>

<http://www.use-less-stuff.com/2009-research/Tuna-LCI-Study-Summary.pdf>

<http://www.use-less-stuff.com/2009-research/Addendum-to-Milk-Container-LCI.pdf>

follows the national trend for plastic bag and film recycling, which increased 28 percent since 2005. During this same period the polyethylene bag and wrap recycling rate doubled.<sup>9</sup> This dramatic growth is driven by several factors including greater consumer access to collection programs and new markets for the recycled materials such as backyard decking, fencing, railings, shopping carts and new bags.<sup>10</sup> Although plastic shopping bags remain a controversial topic, there is increased recognition that bag and wrap recycling at grocery stores is a critical part of the recycling infrastructure that could be eliminated by bans and taxes. This is an important conclusion that was reached by the Illinois Bag Recycling Task Force, which recommended expansion of bag and wrap recycling rather than bans or taxes.<sup>11</sup> For more information on plastic bag and film recycling, please visit: [www.plasticbagrecycling.org](http://www.plasticbagrecycling.org).

### Plastic Foodservice Packaging Reports and Studies

Plastic foodservice cups, plates, and trays are other products which, when made of plastic, are shown by LCA data to have lower environmental impacts than alternatives. Several leading life cycle studies<sup>12, 13, 14</sup>, as well as work conducted by Seattle Public Utilities (SPU),<sup>15</sup> concludes that alternatives to polystyrene foam packaging results in significant increases of non-renewable energy, greenhouse gases, and waste generated. Furthermore, when it comes to foodservice products, the environmental impacts of cleaning reusable products cannot be ignored. Reusable cups, dishes, plates, utensils, place mats, table coverings and other products require copious amounts of water and energy to clean, sanitize and dry. Plastic foodservice packaging conserves these important resources and allows consumers, schools and hospitals to save the water, energy, detergents – and money and labor – required to sanitize reusables. Public health officials also have recognized the important sanitary benefits of these disposable foodservice products, particularly in settings such as hospitals, schools, nursing homes, cafeterias and restaurants where it is critical that the foodservice ware in contact with food be clean and hygienic.

### **Plastics Recycling Resources**

As the Committee considers recycling opportunities, it is important to recognize certain factors impact the recycling of plastics. These factors include supply/volume, contamination, technological barriers and economical sustainable recycling. We encourage the Committee to continue to actively support plastic recycling efforts, as Madison, Wisconsin did back in 2009 with its plastic bag recycling mandate.

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<sup>9</sup> US EPA, Municipal Solid Waste Generation, Recycling, and Disposal in the United States Detailed Tables and Figures for 2008, Table 7, Bags, Sacks and Wraps, HDPE, LDPE/LLDPE <http://www.epa.gov/epawaste/nonhaz/municipal/pubs/msw2008data.pdf>

<sup>10</sup> "2008 National Post-Consumer Recycled Plastic Bags and Film Report," (Moore Recycling Associates, 2009)

<sup>11</sup> Illinois Plastic Bag recycling Task Force, Report to the Illinois General Assembly Pursuant to P.A. 95-0268, May 2010,

<sup>12</sup> Final Peer-Reviewed Report: Life Cycle Inventory of Polystyrene Foam, Bleached Paperboard and Corrugated Paper Foodservice Products, Franklin Associates, Ltd., prepared for Polystyrene Packaging Council, March 2006, <http://www.plasticsfoodservicepackaging.org>

<sup>13</sup> Paper or Styrofoam, A Review of the Environmental Effects of Disposable Cups, University of California at San Diego (UCSD), Dec 2006

<sup>14</sup> Life Cycle Inventory of Foam and Coated Paperboard Plates, Peer-Reviewed Final Report, prepared for Pactiv Corporation, Franklin Associates, Ltd., May 2008

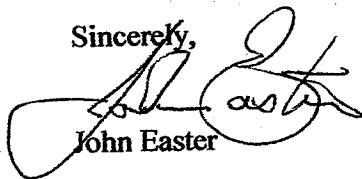
<sup>15</sup> Alternatives to Disposable Shopping Bags and Food Service Items, Volume I, prepared for Seattle Public Utilities, January 2008

ACC continues to promote recycling by providing technical support, working with communities to increase access to collection programs, and promoting greater consumer awareness. ACC works with Moore Recycling Associates to track the recycling progress of bags, film, and non-bottle rigid plastics. The results show a significant increase in plastic recycling over the years, driven by a growing recognition that plastic is a valuable resource—too valuable to waste. For instance, an estimated 832,394,000 pounds of post-consumer film (including plastic bags and product wraps) were recovered in 2008, a 28 percent increase since 2005.<sup>16</sup> The boost in recycling was driven by greater consumer access to collection programs, primarily at large grocery and retail stores, as well as by new markets for these recycled materials.

Similarly, in 2008 over 361 million pounds of post-consumer rigid plastics were collected for recycling nationwide, an increase of nearly 11 percent from 2007.<sup>17</sup> Across the U.S. this recycling expansion is visible. Wichita, Kansas, St. Louis, Missouri and Cleveland, Ohio are all included in the 28 of the 100 largest U.S. cities that currently collect non-bottle rigid plastics through curbside programs. Thus, opportunities exist to cost-effectively expand plastics recycling.

ACC is encouraged to see communities, recyclers and consumers increasingly recognizing the value of plastics and their improved recyclability. We look forward to working with the Committee provide studies and research on plastics and recycling. For further information please contact our Wisconsin lobbyist Tony Driessen at [ahd@dewittross.com](mailto:ahd@dewittross.com).

Sincerely,



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Cc: Committee members and the Legislative Council policy staff members

<sup>16</sup> "2008 National Post-Consumer Recycled Plastic Bags and Film Report," Moore Recycling Associates, 2009.

<sup>17</sup> "2008 National Post-Consumer Report on Non-Bottle Rigid Plastic Recycling," Moore Recycling Associates, 2009.